

## RESPONSIVENESS SUMMARY

To EPA Comments on Proposed Title V Permit  
During Official 45-Day EPA Review Period for

El Paso Natural Gas Company

Bowie Compressor Station (Permit #1000168)  
Dutch Flat Compressor Station (Permit #1000169)  
Hackberry Compressor Station (Permit #1000165)

The following comments were made on April 22, 1998 during the official 45-day EPA Review period which ends on April 30, 1998:

### DUTCH FLAT COMPRESSOR STATION

Comment 1: *Attachment B.I. Emission Limits/ Standards. According to the technical support document, the previous permit for this facility (# 65039M1) limited the amount of natural gas (scf/hr) burned in each turbine, and in the generator engine. All conditions in installation permits and conditions in operating permits deriving from installation permits are applicable requirements and should be included in the title V permit. Even if there is no clear regulatory requirement for the inclusion of these limits in the underlying permit, they may have been included to keep a source out of certain requirements (NSR, NSPS, etc). However, it may be possible to amend the underlying permit to remove certain obsolete, extraneous or environmentally insignificant conditions. Please see EPA's attached comment on removing applicable conditions from title V by amending the underlying permit. The fuel amount limits need to be included, unless ADEQ can and does modify the underlying permit in accordance with our guidance. Note that if the fuel amount limits are included, the previous permit should be cited, and corresponding recordkeeping and reporting requirements should be added to the appropriate sections of this permit.*

Response: In a teleconference call with Erica Ruhl and Ginger Vagenas of the EPA on April 23, 1998, it was discussed that to remove requirements from previous installation permits, the old permit must be amended concurrently with the Title V permit. In addition, limitations that are being removed from previous permits should be disclosed in the public notice document.

The technical support document has been revised to include a discussion pertaining to the removal of the fuel limitation requirement. As mentioned in the technical support

document, we are hereby revising the installation permit through this Part 70 renewal process.

Comment 2: *Attachment B.I.A. Natural Gas Fired Solar Simple Cycle Gas Turbines. A new permit condition (I.A.4) should be added to include the 20% opacity limit from the previous permit, as described in comment #1 above. The pervious permit should be cited for this condition.*

Response: EPA agreed during the teleconference call on April 23, 1998 that because the units burn natural gas, it would be acceptable to remove the opacity limitation. As discussed in the technical support document, we are hereby revising the installation permit through this Part 70 renewal process.

Comment 3: *Attachment B.I.B. Waukesha Auxiliary Generators. A new permit condition should be added to include the 20% opacity limit from the previous permit, as described in comment #1 above. The previous permit should be cited for this condition.*

Response: See response to comment #2 above.

Comment 4: *Attachment B.I.B.2. Opacity Limitation. This permit condition limits the auxiliary generators to "40 percent opacity measured in accordance with the Arizona Testing Manual, Reference Method 9". As written, this condition could be read to imply an exclusive link between the emission limit and the method of determining compliance. Conditions in a title V permit cannot limit the types of data or information that may be used to prove a violation of any applicable requirement, i.e., restrict the use of any credible evidence. To correct this credible evidence problem, emission limits should be separated from the required method of monitoring by placing each in its respective section of the permit. Because no Method 9 tests will be required for this facility, simply removing the language referring to Reference Method 9 from the Emission Limits/Standards section will correct this problem.*

Response: ADEQ agrees with the EPA on this comment. Condition I.B.2 of Attachment B has been revised to read as follows:

"Permittee shall not cause, allow or permit to be emitted into the atmosphere from the auxiliary generators, smoke for any period of time greater than ten consecutive seconds which exceeds 40 percent opacity. Visible emissions when starting cold equipment shall be exempt from this requirement for the first ten minutes."

Comment 5: *Attachment B.I.C.1.a. Open areas, Roadways, Streets, Storage Piles or Material Handling. As written, this condition could be read to imply an exclusive link between the emission limit and the method of determining compliance. However, in this case the language linking the emission limit and the test method ("40% opacity measured by EPA Reference Method 9") is a direct quote from the SIP rule. In the context of credible evidence, language in the SIP overrides any permit language, so EPA cannot require a separation of the emission limit and test method. However, the language in the permit should be revised to match the language in the SIP rule exactly. ("40% opacity measured in accordance with the Arizona Testing Manual, Reference Method 9"). We recognize this seems like a minor change, but the language "measured in accordance with" matches the language in the NSPS 40 CFR 60.8 and will improve the enforceability of the permit.*

Response: ADEQ agrees with the EPA on this comment. Condition I.C.1.a of Attachment B has been revised to read as follows:

"Visible emissions from open areas, roadways, streets, storage piles, or material handling shall not have an opacity greater than 40% measured in accordance with the Arizona Testing Manual, Reference Method 9."

Comment 6: *Attachment B.II.A.2. Fuel Nitrogen Content. Since the waiver of the fuel nitrogen monitoring requirement is clearly explained in the technical support document, we recommend removing this condition altogether from the permit to avoid confusion for the source.*

Response: ADEQ agrees with the EPA on this comment. This section has been removed from the permit.

Comment 7: *Attachment B.III. Reporting Requirements. Reports of required monitoring must be submitted every 6 months, pursuant to A.A.C. R18-2-306.A.5.a. As described in the preamble to 40 CFR Part 70, these reports must include all recordkeeping performed in place of monitoring, i.e., (for this permit) records of dust control measures required by Section II.F.1. Please add a new provision requiring the Permittee to submit a report, at least every 6 months, of all records required under Section II.B. Records on fuel usage, which could be required as described in comment #1 above, would also be included in such reports. This citation for the new condition should be A.A.C. R18-2-306.A.5.a. For convenience, this requirement may be timed to coincide with the compliance certifications required by Section VII of Attachment A.*

Response: ADEQ agrees with the EPA on this comment. A new condition III.B has been added to the permit. Section III.B reads as follows:

“At the time the compliance certifications required by Section VII of Attachment “A” are submitted, the Permittee shall submit reports of all monitoring activities required by Section II of this Attachment performed in the six months prior to the date of the report.”

Comment 8: *Attachment B.IV.A. Testing Requirements. The previous permit required annual tests for CO. Please add this requirement, or follow the attached guidance to determine if removal of this condition is possible. Also, please remove the citation to 40 CFR 60.8 since this rule only applies to performance tests required at the initial startup of equipment.*

Response: Initial performance tests performed in 1994 demonstrate that the emissions of CO for the Taurus and Centaur turbines was 0.17 lb/hr and 0.14 lb/hr, respectively. The most recent performance tests conducted in 1997 demonstrate that the emissions of CO were 0.1 lb/hr and 0.3 lb/hr, respectively. In addition, the emissions inventory for the year 1995 reported CO emissions of 8.06 tpy. In the teleconference call of April 23, 1998, EPA agreed that because there is no emission limitation for this pollutant and, based on past performance tests and emissions inventory, this condition can be removed from the permit. As mentioned in the technical support document, we are hereby revising the installation permit through this Part 70 renewal process.

Comment 9: *Initial Performance Tests. From the data in the technical support document on the initial performance tests (6/94), it appears that each turbine was only tested at one load condition. The NSPS Subpart GG (40 CFR 60.335) requires testing at four load conditions. Please either provide information on additional tests performed on 10/12/90, or add a compliance schedule to properly implement the initial performance test requirement. Also, add a schedule for submission of certified progress reports, as required by R18-2-309.5.c.iii and R18-2-309.d., respectively.*

Response: ADEQ is still evaluating our response to this comment.

#### BOWIE COMPRESSOR STATION

Comment 10: *Attachment B.I.A Natural Gas Fired GE turbine and Auxiliary Engine. The language in conditions 1,2, and 3 suggests these limits apply only to the turbine engines, and not the auxiliary generator. The SIP rule (R9-3-519) says these*

*limits apply to “stationary rotating machinery”. Per recent conversations with David Browner, current district rules define “stationary rotating machinery” as including all internal combustion engines, not just turbines. Please change conditions 1,2, and 3 to apply to stationary rotating machinery, and note in the technical support document that the auxiliary engine is considered stationary rotating machinery. Also, please remove the test method for opacity to avoid a credible evidence problem, as described in comment # 4 above. Since no opacity observations are required for these sources, the test method does not need to be placed elsewhere in the permit.*

Response: ADEQ agrees with the EPA on this comment. Both the permit and the technical support document have been revised to reflect this change. In addition, the test method for opacity was removed as described in the response to comment #4 above.

Comment 11: *Attachment B.I.B.1.a. Open Areas, Roadways, and Streets, Storage Piles, and Material Handling. Please make the correction described in comment #5 above.*

Response: ADEQ agrees with the EPA on this comment. Please see revision in response to comment #5 above.

Comment 12: *Attachment B.III. Reporting Requirements. Reports of required monitoring must be submitted every 6 months, pursuant to A.A.C. R18-2-306.A.5.a. As described in the preamble to 40 CFR Part 70, these reports must include all recordkeeping performed in place of monitoring, i.e., (for this permit) records of dust control measures required by Section II.F.1. Please add a new provision (III.D) requiring the Permittee to submit a report, at least every 6 months, of all records required under Section II.B. This citation for the new condition should be A.A.C. R18-2-306.A.5.a. For convenience, this requirement may be timed to coincide with the compliance certifications required by Section VII of Attachment A.*

Response: ADEQ agrees with the EPA on this comment. Please see revision in response to comment #7 above.

Comment 13: *Attachment B.V. Turbine Uprate to 10736 Horsepower. The first sentence states, “During the term of this permit, Permittee may uprate the existing engine to 10736 hp.” Any modification of the source must be evaluated to see if any new source review requirements (or NSPS, HAP limits, etc.) are triggered. There is no authority in the title V program to allow the bypassing of such requirements. Therefore, please remove the first sentence of this section. Alternatively, this sentence may be retained if ADEQ conducts the required analysis of the proposed modification prior to the issuance of the permit. Language should be added*

*clarifying that if a source does not begin construction within 18 months of the BACT determination, an new BACT determination would need to be made before the modification can occur. Whether or not new requirements are triggered, the analysis must be clearly documented in the technical support document if the first sentence is retained.*

Response: The technical support document has been revised to document the analysis used to determine that no new requirements are triggered.

Comment 14: *Attachment B.V.B.2. Fuel Nitrogen Content. Since the waiver of the fuel nitrogen monitoring requirement is clearly explained in the technical support document, we recommend removing this condition altogether from the permit to avoid confusion for the source.*

Response: ADEQ agrees with the EPA on this comment. This section has been removed from the permit.

#### HACKBERRY COMPRESSOR STATION

Comment 15: *Attachment B.I.A.2. Opacity Standard. Please remove the test method for opacity to avoid a credible evidence problem, as described in comment # 4 above. Since no opacity observations are required for this source, the test method does not need to be placed elsewhere in the permit.*

Response: ADEQ agrees with the EPA on this comment. The language has been revised as described in the response to comment #4 above.

Comment 16: *Attachment B.I.B.1.a. Open Areas, Roadways, and Streets. Please make the correction described in comment #5 above.*

Response: ADEQ agrees with the EPA on this comment. The language has been revised as described in the response to comment #5 above.

Comment 17: *Attachment B.III. Reporting Requirements. Please make the correction described in comment #12 above.*

Response: ADEQ agrees with the EPA on this comment. Please see revision in response to comment #7 above.

Comment 18: *Attachment B.IV. Testing Requirements. According to the technical support*

*document, a previous permit required annual tests for CO. Please add this requirement, or follow the attached guidance to determine if removal of this condition is possible.*

Response: The most recent performance tests performed in 1997 demonstrate that the emissions of CO for each of the GE turbines was 0.6 lb/hr and 0.2 lb/hr, respectively. In addition, the emissions inventory for the year 1995 reported CO emissions of 13.71 tpy. In the teleconference call of April 23, 1998, EPA agreed that because there is no emission limitation for this pollutant and, based on past performance tests and emissions inventory, this condition can be removed from the permit. As mentioned in the technical support document, we are hereby revising the operating permit through this part 70 renewal process.

**RESPONSIVENESS SUMMARY**  
**For**  
**Air Quality Control Permit Number 1000165**  
**Issued To**  
**El Paso Natural Gas Company, Hackberry Compressor Station**  
**Begin Public Notice : September 28, 1997**  
**End Public Notice : October 28, 1997**

All of the following comments were submitted by El Paso Natural Gas Company.

**TABLE 1 : Summary of Permit Requirements**

*Comment 1: SOx Monitoring/Recordkeeping - The "< 0.017 wt% (5gr/100 scf) should be replaced with "0.8 percent by weight" since the sulfur dioxide standard in R18-2-719.J references 0.8 weight percent.*

*Response:* EPNG is required under FERC agreement to limit sulfur content in natural gas to less than 5 gr/scf which is equivalent to 0.017 weight percent. Our regulations require EPNG to limit the sulfur content to less than 0.8 weight percent. FERC stipulated 0.017% was specified as a reference. This has been removed to make the table consistent with the statements in permit conditions II.A.1 and II.B.1 of Attachment "B". The table has been updated to reflect this change.

*Comment 2: NOx, CO, VOC, HAPs Testing Frequency/Methods - The language should be revised to state as follows:*

*One time for NOx and CO on each turbine within 6 months of permit expiration if turbines are operated for 15 cumulative days using Method 20 and 10.*

*Response:* EPNG is required to test one time only for those pollutants which are emitted in excess of 100 tons/year and for which there are no applicable standards. Hackberry compressor station emits only NOx in excess of 100 tons/year. Therefore, clarification will be made by revising the language to say the following:

*One time for NOx on each turbine within six months of permit expiration if turbines are operated for more than 15 cumulative days using Method 20.*

*Comment 3: F4 a and b. Mobile Sources - Monitoring/Recordkeeping - The language should be revised as follows:*

*Record of all emissions related maintenance activities performed on Permittee's roadway and site cleaning machinery stationed at the facility.*

*Response:* The table has been modified to include the language "stationed at the facility". F.4.a and F.4.b now read as follows:

F.4.a. Records of emissions related maintenance activities performed on Permittee's off-road machinery stationed at the facility.



F.4.b. Records of emissions related maintenance activities performed on Permittee's roadway and site cleaning machinery stationed at the facility.

## ATTACHMENT A

*Comment 4: II. Compliance with permit conditions:*

*A. The first sentence of this provision should be reworded to conform to the permit shield provisions of R18-2-325 as follows:*

*The Permittee shall comply with all conditions of this permit, which sets forth all applicable requirements of Arizona air quality statutes and the air quality rules.*

*The existing language could be read as requiring the Permittee to comply with “all applicable requirements” which contradicts the purpose of a Class I permit.*

*Response:* This change has been made.

*Comment 5: XVII. Testing Requirements*

*EPNG understands that normal rated capacity means capacity reflecting ambient temperature, pressure and humidity conditions present during the emissions test. EPNG also understands that ADEQ's inclusion of the provision allowing for performance testing at lower operational rates with the Director's prior written approval acknowledges that at certain times there may be insufficient natural gas throughput to operate at “normal rated capacity” in which case testing may be deferred or conducted at a lower operating rate. While EPNG would prefer that ADEQ include permit language defining normal rated capacity as capacity reflecting ambient conditions and available pipeline capacity, EPNG is willing to accept ADEQ's explanation of its intent in the Technical Review Document and response to these comments.*

*Response:* ADEQ is aware that EPNG may or may not operate the turbines at their normal rated capacity, during the life of the permit. Given the unpredictability in operations, it was decided that the optimal course of action would be to obtain written approval from the Director at the time of testing, if the testing is to be performed at a lower rate. This comment does not result in a change in the permit language.

## ATTACHMENT B

*Comment 6: Emissions Limitations (I.B.1.b.3)*

*EPNG understands that dust suppressants or wetting agents are to be used during construction operations, repair operations, and demolition activities directly associated with earth moving or excavation activities likely to generate excessive amounts of particulate matter and not for any construction operation, repair operation, or demolition activity. EPNG requests ADEQ clarification if this is not ADEQ's intent.*

*Response:* The intent of condition I.B.1.b.3 of Attachment “B” of the permit is to regulate excessive emissions of particulate matter. The intent of this condition is further clarified by the wording of condition I.B.1.b which is as follows: “Permittee shall employ the following methods to prevent excessive amounts of particulate matter from becoming airborne:”. Those construction, repair, or demolition operations that have no associated particulate matter emissions are not subject to the requirements of condition I.B.1.b.3 of Attachment “B” of the permit. This

comment does not result in a change in the permit language.

*Comment 7: Emissions Limitations (I.C.5)*

*On occasion, EPNG personnel will need service air conditioners at remote compressor stations. Therefore, we need to add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only “applicable” requirements must be met by EPNG.*

5. Nonvehicle Air Conditioner Maintenance and/or Services

*When Permittee’s employees are servicing applicable appliances, the permittee shall comply with applicable requirements of 40 CFR 82- Subpart F.*

*Response:* The Permittee originally stipulated in their permit application that air conditioning servicing was expected to be performed by outside contractors. During the public comment period, EPNG decided that they might perform such activities themselves and requested for the inclusion of applicable requirements of 40 CFR 82 - Subpart F in the permit. The following condition has been added in I.C.5 in Attachment “B” of the permit.

Permittee shall comply with all of the requirements of 40 CFR 82 Subpart F (Protection of Stratospheric Ozone - Recycling and Emissions Reduction).

*Comment 8: Monitoring and Recordkeeping (II.A.1)*

*EPNG understands that we need to maintain an updated copy of the extracted portion of the FERC approved tariff which pertains to the sulfur content and lower heating value of the fuel and not the entire FERC tariff which is a voluminous and periodically edited document. EPNG requests ADEQ clarification if this is not ADEQ’s intent.*

*Response:* The intent of condition II.A.1 of Attachment “B” of the permit is to monitor particulate and sulfur dioxide emission standards only. The language has been modified to further clarify that tariff information relating only to lower heating value and fuel sulfur content needs to be kept on file. The modified language is reproduced below:

Permittee shall monitor daily, the sulfur content and lower heating value of the fuel being combusted in the gas turbines. This requirement may be complied with by maintaining a copy of that part of the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits transmission to pipeline quality natural gas of sulfur content less than 0.8 percent by weight and having a heating value greater than or equal to 967 Btu/ft<sup>3</sup>.

*Comment 9: Monitoring and Recordkeeping (II.B.1)*

*For a more streamlined permit, EPNG suggests that ADEQ consider combining the identical provisions of II.B.1.c through II.B.1.i. EPNG proposes*

- c. Dates on which any of the activities listed in I.B.1.b.(3) through (9) were performed, and control measured adopted.

*Response:* The current format of condition II.B.1 of Attachment “B” of the permit will be retained since it enhances the

readability of the permit.

*Comment 10: Monitoring and Recordkeeping (II.C.1)*

*A record of the abrasive blasting project requires a log in ink. EPNG requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic recordkeeping. Since EPNG must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.*

*Response:* The language of condition II.C.1 of Attachment “B” of the permit has been modified as follows:

“Each time an abrasive blasting project is conducted, the Permittee shall log in ink **or in an electronic format**, a record of the following:....”

*Comment 11: Monitoring and Recordkeeping (II.C.2)*

*A record of the spray painting project requires a log in ink. EPNG requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic recordkeeping. Since EPNG must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.*

*Response:* The language of condition II.C.2 of Attachment “B” of the permit has been modified as follows:

“Each time an spray painting project is conducted, the Permittee shall log in ink **or in an electronic format**, a record of the following:....”

*Comment 12: Monitoring and Recordkeeping (II.C.3)*

*EPNG continues to assert that there is no strict correlation between maintenance activities and exceeding the 40 % opacity standard for mobile sources. EPNG objects to the current provision to the extent that it seeks to require recordkeeping of mobile sources that are not permanently or semi-permanently maintained at the station. EPNG understands that equipment brought in from other areas of the system must comply with the mobile source requirements of 18-2-802 and R18-2-804(a), but mobile equipment stationed elsewhere should not be subject to site-specific permit requirements. EPNG has mobile sources located in El Paso, Gallup, and other locations within the EPNG system. The current permit language requires a record of maintenance activities of Permittee’s equipment. “Permittee’s equipment” could mean equipment stationed in El Paso or other EPNG locations that would never be used at the permitted facility. Therefore, EPNG requests that the permit language be revised as follows:*

The Permittee shall keep a record of all emissions related maintenance activities performed on Permittee’s mobile sources stationed at the facility as per manufacturer’s specifications.

*Response:* ADEQ agrees with EPNG. The language has been changed to include “stationed at the facility”.

*Comment 13: Monitoring and Recordkeeping (II.C.5)*

*On occasion, EPNG personnel will need service air conditioners at remote compressor stations. Therefore, we*

*need to Add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only “applicable” requirements must be met by EPNG.*

5. Nonvehicle Air Conditioner Maintenance and/or Services

*As a means of demonstrating compliance with condition I.C.5 of this Attachment, the Permittee shall keep a record of all relevant paperwork of 40 CFR Part 82-Subpart F applicable requirements on file.*

*Response:* Please see Comment #7. The following condition has been added in II.C.5 of Attachment “B” of this permit:

*As a means of demonstrating compliance with condition I.C.5 of this Attachment, the Permittee shall keep a record of all paperwork relevant to the applicable requirements of 40 CFR 82 - Subpart F on file.*

*Comment 14: Monitoring and Recordkeeping (II.D)*

*EPNG understands that a log of all records does not preclude the use of a three ring binder or centralized file folders. EPNG requests ADEQ clarification if this is not ADEQ’s intent. The location of records should be changed as follows:*

*Permittee may retain all records relating to this permit and a copy of the permit at the Topock Complex Office, 5499 Needle Mountain Road, Topock, AZ 86436.*

*Response:* ADEQ agrees with EPNG that a log of all records does not preclude the use of a three ring binder or centralized file folders. Also, the location of records has been updated in the permit.

*Comment 15: Testing Requirements (IV.A)*

*EPNG agrees with the Technical Review Document that there are no emission limits or standards for NOx and CO for the units at the facility. EPNG does not believe that R18-2-719 or any other applicable requirement establishes NOx and CO emissions standards applicable to the station. Although EPNG believes there is no basis for NOx and CO testing requirements, EPNG does, however, understand ADEQ’s intent in providing corroborating data to supplement the existing emissions estimates. By agreeing to this one-time test, EPNG is not conceding that any such testing is required.*

*Response:* EPNG’s stance on this issue has been noted. Only testing for emissions of NOx is applicable to the Hackberry facility.

**ATTACHMENT C**

*Comment 16: EPNG requests that the following additional item be added to the list of “requirements specifically identified as applicable”:*

*40 CFR 82 - Protection of Stratospheric Ozone - Subpart F - Recycling and Emissions Reduction*

*Response:* Please see Comment #7. This item has been added to the relevant list in Attachment C of the permit.

*Comment 17: EPNG requests that the following additional item be added to the list of “requirements specifically identified as not applicable”:*

*R18-2-901.39 - New Source Performance Standard - Stationary Gas Turbines*

*Response:* The turbines at Hackberry were installed in 1966 and since then have not been modified with a capital expenditure (they performed a screwdriver uprate of 348 hp on each turbine in 1991). Therefore, these turbines are not subject to NSPS. However, this item already was on the non applicable list in Attachment C of the permit.

#### **ATTACHMENT D**

*Comment 18: There is no notation at the bottom of the table for the asterisk next to "Size".*

*Response:* This item has been added to the permit.

*Comment 19: The Date of Manufacture in the table should be changed to "Date of Installation/Date of Manufacturer".*

*Response:* This change has been made.

#### **ADDITIONAL CHANGES MADE TO PERMIT**

*Change 1:* The original location of the Hackberry compressor station stated in the permit application was: 20 miles E of Kingman, ½ mile N off I-40, Exit 71. A more accurate location was supplied by EPNG on September 25, 1997 and was updated in the Summary on Page 1 of the permit to read:

20 miles east of Kingman, Arizona, one mile north off Interstate 40 at Exit 71

*Change 2:* EPNG provided the following comment for the Seligman Compressor Station permit #1000158:

*Opacity: The table should include exemption for the first 10 minutes after cold starting as noted in R18-2-719.E.*

*Response:* ADEQ agrees with EPNG. Because this is applicable to the Hackberry station as well, the exemption for the first 10 minutes after cold starting has also been added to the table in the Hackberry permit.

*Change 3:* EPNG provided the following comment for the Seligman Compressor Station permit #1000158:

*F.1.b - “Unused open areas” - Remove “Monthly status of unused open areas” and keep only “Dates fresh vegetation added” so that it is consistent with Attachment*

*B.II.B.1.b.*

*Response:* Because this was applicable to the Hackberry station as well, the requirement to record monthly status of open areas has been removed from the Hackberry summary table. This change makes the table consistent with the permit condition II.B.1.b in Attachment B.

*Change 4:* EPNG provided the following comment for the Alamo Lake Compressor Station permit #1000604:

*Testing Requirements (IV.A1)*

*At some EPNG locations, there is a high pressure pipeline system and low pressure pipeline system that is distinct and each system is connected to only one particular turbine unit. Therefore, if there is no means of routing the natural gas between the systems, one unit may operate while the other may not. Since the intent of the requirement is to mandate testing of a particular unit, the fifteen cumulative days should be unit specific rather than location specific.*

*The requirement to conduct a performance test on the GE turbine engine if the cumulative days of operation of all engines during the permit term exceed fifteen days should be changed to read as follows:*

Permittee shall conduct performance tests on the General Electric turbine engine if the cumulative days of operation of the unit during the permit term exceed fifteen days.

*Response:* In order to ensure consistency among all the compressor station permits and to ensure economic parity among all Permittees, ADEQ has decided to require performance testing of all units at a location if the combined operation of all the units at the location exceeds fifteen days. Hence, a reprieve from testing cannot be granted.

It is ADEQ's intent to provide corroborating data for non-NSPS sources to supplement the existing emission estimates through one-time testing of non-NSPS sources during the life of the permit. ADEQ understands that it may so happen that only one unit is operated during the permit term for reasons quoted in Comment 15 and the other is not operated at all during permit term and hence need not be tested. It is exactly this situation that ADEQ wishes to avoid by mandating a one time testing of a non-NSPS unit based on cumulative days of operation of all turbines combined exceeding fifteen days during the permit term. There is no change in the permit term.

Because the Hackberry compressor station also has two non-NSPS turbines, and because

these situations are similar, the language in the testing section of the Hackberry permit was clarified to read as follows:

The Permittee shall conduct one set of performance tests for nitrogen oxides on each one of the turbine engines. Performance tests shall be performed on the engines if the cumulative days of operation of all engines **combined** during the permit term exceed fifteen days. These performance tests shall be completed within six months prior to this permit expiration. Each set of performance tests shall include all of the pollutants listed in Section IV.B of this Attachment.